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21 UNITED STATES DISTRICT COURT

22 DISTRICT OF ARIZONA

23 In Re Bard IVC Filters Products
24 Liability Litigation

25 No. MD-15-02641-PHX-DGC

26 **MOTION TO FILE UNDER SEAL**

27 **(Filed *Ex Parte*)**

28 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
1 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
2 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
3 Local Civil Rule 5.6 for leave to file under seal Motion to Amend Scheduling Order:
4 Common Benefit Fees and Expense Reimbursement ("Motion to Amend").

5 The Motion to Amend contains confidential information relating to procedures
6 affecting all Participating Counsel as defined in Case Management Order No. 6 (Doc.
7 372). Furthermore, as the Court is undoubtedly aware, all filings related to the Common
8 Benefit Fee and Cost Committee have been filed under seal in this litigation.
9 Accordingly, good cause exists for sealing the Exhibit.

RESPECTFULLY SUBMITTED this 13th day of May 2021.

BEUS GILBERT MCGRODER PLLC

By:s/ Mark S. O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine